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UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT  
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 v.  
16 VIRTUAL CURRENCY AND  
17 \$2,061,517.68 IN U.S. CURRENCY,  
18 Defendants.

Case Number 2:25-cv-04631-SB-MAR

STIPULATION TO EXTEND TIME TO  
RESPOND TO INITIAL SERVED  
COMPLAINT BY NOT MORE THAN 30  
DAYS

[Civil Local Rule 8-3]

Complaint Served: August 13, 2025

Current Claim Due Date: Sept. 17, 2025

Current Answer Due Date: Oct. 8, 2025

New Claim Due Date: Oct. 17, 2025

New Answer Due Date: Nov. 7, 2025

24  
25 Pursuant to Civil Local Rule 8-3, plaintiff United States of America and potential  
26 claimant Concord Music Group (“Potential Claimant”) hereby stipulate and agree to  
27 extend the time for Potential Claimant to respond to the initial complaint served in this  
28 action. The complaint was served August 13, 2025. Potential Claimant’s time to file a

claim to contest the forfeiture of the defendants is September 17, 2025, and an answer to the complaint is due twenty-one (21) days thereafter (*i.e.*, October 8, 2025). *See* Suppl. Rule G(4)(b)(ii) of the Federal Rules of Civil Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions. The parties have agreed to a thirty-day extension of these deadlines. Accordingly, potential claimant's time to file a claim to the defendants is extended to October 17, 2025, and an answer or other responding document to the complaint is extended to November 7, 2025.

Dated: September 12, 2025

Respectfully submitted,

BILAL A. ESSAYLI

Acting United States Attorney

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Assistant United States Attorney

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/s/ James E. Dochterman

JAMES E. DOCHTERMAN

Assistant United States Attorney

Asset Forfeiture & Recovery Section

Attorneys for Plaintiff

UNITED STATES OF AMERICA

DATED: September 12, 2025

/s/ with permissions

STEVEN R. WELK

Dentons US LLP

Attorney for Potential Claimant

CONCORD MUSIC GROUP

**PROOF OF SERVICE BY E-MAIL**

I am a citizen of the United States and a resident of or employed in Los Angeles County, California; my business address is the Office of United States Attorney, 312 North Spring Street, 11th Floor, Los Angeles, California 90012; I am over the age of 18; and I am not a party to the above-titled action;

On September 12, 2025, I served a copy of: **STIPULATION TO EXTEND THE TIME TO RESPOND TO INTIAL SERVED COMPLAINT BY NOT MORE THAN 30 DAYS** on each person or entity named below by transmitting the document by electronic mail to the e-mail address indicated for receipt of e-mail on the date and place shown below following our ordinary office practices. Each person has given consent to receive service by e-mail.

**TO: STEVEN R. WELK**  
**Dentons US LLP**  
**4675 MacArthur Court, Suite 1250**  
**Newport Beach, California 92660**  
**steve.welk@dentons.com**

I am readily familiar with the practice of this office for transmittal of electronic mail from a desktop computer which allows for confirmation that an e-mail message was sent on a particular day and time. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on September 12, 2025, at Los Angeles, California.

***Cecilia Anderson***  
**CECILIA ANDERSON**